

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION**

**No. 5:20-ct-03231-M**

**BRETT ABRAMS,**

Plaintiff,

v.

**WILLIS FOWLER.**

Defendants.

**PLAINTIFF’S MOTION TO COMPEL  
FURTHER RESPONSES TO  
INTERROGATORIES AND REQUESTS  
FOR PRODUCTION OF DOCUMENTS**  
Fed. R. Civ. P. 37

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Pursuant to Rule 37 of the Federal Rules of Civil Procedure, Plaintiff Brett Abrams hereby moves to compel Defendant Willis Fowler to provide further, complete responses to the following discovery requests:

- (1) Interrogatories Nos. 6(a), 7(a), 18; and
- (2) Requests for Production of Documents Nos. 16, 17 and 18.

This motion is supported by the accompanying memorandum, exhibits, the record in this case, and any other relevant materials that may be presented to the Court.

Plaintiff respectfully requests that the Court enter an order compelling Defendant to provide further responses to the requested discovery and for the reimbursement of reasonable expenses incurred in making this motion, including attorneys’ fees.

Respectfully submitted on March 30, 2023.

/s/ Daixi Xu

Daixi Xu

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### **CERTIFICATE OF SERVICE**

I hereby certify that on March 30, 2023, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Daixi Xu  
Daixi Xu